

**HAMMERMAN ROSEN LLP**

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Attorneys for Defendant, McKaila Coulter

**UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY**

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CHRISTOPHER TORRE

Plaintiff,

-vs-

CHRISTINA KARDOONI and  
MCKAILA COULTER  
Defendants

**Civil Action No.: 2:22-cv-04693-SDW-MAH**

Judge Susan D. Wigenton, Presiding

Judge Michael A. Hammer, Referral

**NOTICE OF MOTION TO DISMISS**

Date: November 7, 2022

Time: 9:00 a.m.

**Oral Argument Requested**

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TO: David D. Lin, Esq.  
Lewis & Lin, LLC  
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Attorney for Christopher Torre

**COUNSELOR:**

**PLEASE TAKE NOTICE THAT** the undersigned attorneys for McKaila Coulter ("Defendant") will apply to the above named Court at the United States District Court, Newark, New Jersey on November 7, 2022, at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, for an Order dismissing Plaintiffs Complaint for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2).

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion the undersigned will rely upon the enclosed Memorandum of Law, supporting certifications and

exhibits;

**PLEASE TAKE FURTHER NOTICE** that, in accordance with Local Civil Rule 7.1(e) a proposed Order is annexed hereto; and,

**PLEASE TAKE FURTHER NOTICE** that, in accordance with Local Civil Rule 78.1(b), Defendants respectfully request that this matter be scheduled for oral argument.

**HAMMERMAN ROSEN LLP**

s/ Marvin J. Hammerman

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*Attorneys for Defendant, McKaila Coulter*

*Dated: September 26, 2022*